



Law Offices of
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June 27, 2024

BY ECF

Hon. Margaret M. Garnett
United States Courthouse
40 Foley Square
New York, NY 10007

**RE. *Capers v. BSREP UA 3333 Broadway LLC et al.,*
24cv3892 (MMG)(SN)**

Dear Honorable Judge Garnett,

I am writing on behalf of my client, Ms. Tonya Capers ("Plaintiff"), in connection with the case referenced above. I am respectfully submitting this letter motion to request an extension of time for the submission of the joint letter and the proposed Case Management Plan ("CMP"), currently due on July 2, 2024. Additionally, I am seeking an adjournment of the initial conference, which is presently scheduled for July 9, 2024. Please note that this is the Plaintiff's first request for such an extension and adjournment, and it does not impact any other deadlines associated with this case.

The Defendants were properly served with a summons and complaint on June 11, 2024, (see Dkt. Docs. # 8 and 9), and a subsequent service was made via first-class mail on June 28, 2024. As of now, I have not been contacted by a representative from either Defendant, and their period to respond has not yet expired. Consequently, I have been unable to ascertain whether the Defendants consent to these requests.

Despite this, I am seeking your understanding and approval for an extension of time to submit the joint letter and proposed CMP, as well as an adjournment of the Rule 16 conference. This request is necessitated by a pre-planned absence, as I will be out of the country from July 5, 2024, through July 19, 2024.

I appreciate your consideration of this request and thank you in advance for your understanding.

Respectfully Submitted,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

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cc: (via First class mail)

Urban American Management NYC, LLC
230 Park Ave.
New York, NY 10169

Urban American Management NYC, LLC
552 Main Street
New York, NY 10044

BSREP UA 3333 Broadway LLC
3333 Broadway
TOWER-A
New York, New York 10031

Application GRANTED. The Initial Pretrial Conference scheduled for July 9, 2024 is ADJOURNED to **Tuesday, August 6, 2024 at 9:30 a.m.** in Courtroom 906 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY 1007. The parties shall submit their joint letter and proposed Case Management Plan and Scheduling Order in accordance with this Court's May 5, 2024 Order (Dkt. No. 5) no later than **July 30, 2024**.

The Clerk of Court is respectfully directed to terminate Dkt. No. 10.

SO ORDERED. Dated July 1, 2024.


HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE